

1 CLARK COUNTY SCHOOL DISTRICT  
2 OFFICE OF THE GENERAL COUNSEL  
3 CRYSTAL J. HERRERA, ESQ.  
4 Nevada Bar No. 12396  
5 5100 West Sahara Avenue  
6 Las Vegas, Nevada 89146  
7 Telephone: (702) 799-5373  
8 Facsimile: (702) 799-7243  
9 Herrec4@nv.ccsd.net  
10 *Attorney for Defendants*

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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

11 DESHUN THOMAS, individually, and as  
12 Natural Parent and Guardian for L.J., and  
13 KRISTIN WOODS as Co-Guardian Ad Litem  
14 for L.J.,

15 Plaintiffs,

16 v.

17 BEVERLY DADE, individually, and in her  
18 official capacity; RICHARD FULLER,  
19 individually, and in his official capacity;  
20 PATRICIA SCHULTZ, individually, and in  
21 her official capacity; PAT SKORKOWSKY,  
22 individually, and in his official capacity;  
23 CLARK COUNTY SCHOOL DISTRICT, a  
24 Political Subdivision of the State of Nevada,  
25 DOE TEACHER'S AIDE, in his/her official  
26 capacity; DOES I through X, inclusive; and  
27 ROES I though X, inclusive,

28 Defendants.

Case No. 2:19-cv-01019-JAD-BNW

**STIPULATION AND ORDER TO  
EXTEND TIME TO FILE REPLY IN  
SUPPORT OF MOTION TO DISMISS  
(FIRST REQUEST)**

Plaintiffs Deshun Thomas, individually and as the natural parent and guardian of minor L.J., and Kristin Woods, co-guardian ad litem for L.J. (hereinafter, "Plaintiffs"), and Defendants Clark County School District, Richard Fuller, Beverly Dade, Patricia Schultz and Pat Skorkowsky, by and through their respective attorneys of record, hereby stipulate and agree as follows:

1. On July 15, 2019, Defendants Patricia Schultz and Pat Skorkowsky (“Defendants”) filed a Motion to Dismiss Plaintiffs’ Complaint. ECF No. 19.
2. Following an extension, Plaintiffs filed a Response to Defendants’ Motion to Dismiss, on August 2, 2019. ECF No. 29. The Response was corrected on August 7, 2019. ECF No. 32.
3. Defendants’ deadline to file a reply to the Response is August 9, 2019. However, defense counsel needs additional time to prepare a reply in light of unexpected scheduling concerns.
4. The parties agree to briefly extend the time for Defendants to file a reply to Plaintiffs’ Response by one (1) week, through and including **August 16, 2019**.
5. This stipulation is made in good faith and not for the purpose of delay.

Dated: August 8, 2019

GANZ & HAUF

By: /s/ Suzanne E. Carver  
Marjorie Hauf, Esq. (#8111)  
Suzanne E. Carver, Esq. (#14689)  
8950 W. Tropicana Ave. #1  
Las Vegas, NV 89147  
*Attorney for Plaintiffs*

Dated: August 8, 2019

CLARK COUNTY SCHOOL DISTRICT  
OFFICE OF THE GENERAL COUNSEL

By: /s/ Crystal J. Herrera  
Crystal J. Herrera (#12396)  
5100 West Sahara Avenue  
Las Vegas, Nevada 89146  
*Attorney for Defendants*

**ORDER**

**IT IS SO ORDERED.**

Dated: August 12, 2019.

  
UNITED STATES DISTRICT JUDGE